

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

13-CV-2896

1. _ ANTONELLO BOLDRINI :

Plaintiffs :

v. :

2. _ FREDERICK J. AMMERMAN :

personally And in his Capacity as Judge of :
Court of C. Pleas of Clearfield County, PA :

AND :

3. _ PATRICK FORD, personally and in his :
official Capacity as District Magistrate :
46-3-01 DuBois, Clearfield County, PA :

AND :

4. _ EARLE D. LEES personally and in his :
official Capacity as Assistant District :
Attorney of Clearfield County, Pennsylvania :

AND :

5. _ ALBERT C. ONDREY, personally and in :
his capacity as 1th. ADA Bradford County, PA :

AND :

6. _ John Phil Doe personally & in his official :
capacity as PASP which arrested the Plaintiff :
at Philadelphia PA, Airport on 12/16/2008 :

AND :

7. _ JOHN SUGHRUE personally & in his :
capacity: As Principal of his Lawyer Firm, :
Market Street, Clearfield, PA. :

AND :

8. _ LAURA HATHORN, personally & in his :
capacity as Officer Reporter for the Court for :
Schreiber Reporting Service, St Marys, PA :

AND :

9a) _ JOHN DOE P.SERVERINE@ And :

9b). WWW.PACRIMESTOPPER.ORG :

personally: And as WEB's Person in charge at :
1800 Elmerton Avenue, Harrisburg PA, 17110 :

AND :

10. _ SAMUEL LOMBARDO personally :

AND in his official capacity as Warden of the :
Clearfield County Prison C.C.J. Pennsylvania :

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SCRANTON

NOV 27 2013

PER

DEPUTY CLERK

AND :

11_ JOHN M.F. DOE personally And in his :
official capacity as Deputy Warden, LT of the :
Clearfield County Prison C.C.J. Pennsylvania :

AND :

12_ DANIEL J. NELSON personally & in his :
official capacity as Court Administrator of :
Clearfield County Pennsylvania :

AND :

13_ JOHN A. REILLY JR. personally And :
in his official capacity as Superintendent of :
GEORGE W. HILL Correctional Facility :
Delaware County Prison, Pennsylvania :

AND :

14_ WALTER A. STROHL personally And in :
his official capacity as District Magistrate :
Court 32-2-48, LIMA Delaware County PA :

AND :

15_ JOHN DOE DEC.16 personally & in his :
official capacity Delaware County Constable :

AND :

16_ CLARENCE CATALDO AND :
16a) CATALDO COLLISION SER., Penfield :
16b) CATALDO COLLISION, INC, Du-Bois: :

AND :

17_ KEN REBER Personally AND :
17a). CHARLES REBER AND :
17b). BZ MOTORS CHRYSLER, INC. :
Lewisburg, Union County, Pennsylvania :
AND :

18_ DAVID W. SWARTZLANDER AND :
18a) C.P.R. AUTO CENTER :
930 State route 104, Mifflinburg, PA :
AND :

19_ DONALD FERRARIO personally AND: :
19a). FERRARIO AUTO CENTER AND: :
19b). FERRARIO AUTO TEAM :
RR 6, Towanda, PA 18848 :
AND :

20_ BRADLEY SHATINSKY personally :
And in his official capacity as Corporal of the :
Pennsylvania State Police PSP Tunkhannock :
AND :

21. RONALD JARROCHA personally & in his:
official capacity as Trooper Fire Marshall of :
Pennsylvania State Police PSP Wyoming, :
AND :
22)_ GERRI MILLER & 22b) JOHN DOE :
WWW. SOLOMONSWORD.BLOGSPOT.COM :
AND :
23a)_ SCOTT D. CLINE And :
23b).JENNIFER L. HUTTON And :
23c). LAURIE J. REED in theirs Official :
capacity as officer of Clearfield County :
Department of Probation Services :
AND :
24a)_ FRANK PIONTEK And :
24b).ROBERT RACHILA And :
24c).JAMIE MACLUNNY in theirs official :
capacity Dpt. Probation Services of Luzerne C:

I. JURISDICTION.

1. This is a Civil Tort Action filed pro-se, by the Plaintiffs, Antonello Boldrini, ("Boldrini") Citizen of the Country of Italy (EU) Alien Permanent Resident of United States of America at 81 Frothingham Street Pittston Twp, Pennsylvania, is brought to this United States Federal Court For The Middle District of PA pursuant 42 USC # 1985 and 28 USC 1331 against the Defendants which acting under color of law violated his Rights under the Fifth, and Fourteenth Amendments to the United States Constitution, and in violation of United States Code under title 18 provisions.
2. In this Action the Defendants "private parties" are considerer acting under the color of state law pursuant as ruled by the Supreme that "private parties" may be held to the same standard of "state actors" in cases such decisive act was carried out in conspiracy with a state official.

[See: Dennis v.Sparks,449 U.S. 24, 101 S. Ct., 183 and Adickes v. S.H .Kress & Co., 398 U.S. 144,90 S. Ct.1598].

3. This court has jurisdiction over the subject matter of this action pursuant to 28 U.S.C. § §1331, 1332, 1343, 1367, and pursuant to 28 U.S.C. # 1391(b)(1)(2), the Plaintiffs are residing in Luzerne County under this MDC Jurisdiction: and all the Defendants resides in the State of Pennsylvania, and Substantial part of property that is the subject of the action is in this Middle District Court.

II. PARTIES

4. PLAINTIFF:

5. (P.1) ANTONELLO BOLDRINI ("Boldrini") Italian Citizen Alien USA permanent resident at 81 Frothingham Street, Pittston Township, 18640, Luzerne County, PA. Herein Boldrini's son Daniele A Boldrini, is nominee action's successor if the events will required such nomination.

6. DEFENDANTS:

5 (D.2) FREDERICK J. AMMERMAN, is a citizen and resident of Clearfield County, PA and was at all times material to the allegations in this Complaint, acting in his capacity as Judge of Court of the Common Pleas of Clearfield County, 230 East Market Street, Clearfield, Pennsylvania, 16830 employed by Clearfield County, Pennsylvania, and was acting under color of state law.

4. (D.3) PATRICK FORD, is a citizen and resident of Clearfield County, Pennsylvania and was at all times material to the allegations in this Complaint, acting in his capacity as District Magistrate 46-3-01 in DuBois, Clearfield County, employed by Clearfield County, Pennsylvania, and was acting under color of state law.

5. (D.4) EARLE D. LEES is a citizen and resident of Clearfield County, Pennsylvania and was

from December 2008 at all times material to the allegations in this Complaint, acting in his capacity as Assistant District Attorney representing in Court the Commonwealth of Pennsylvania, against Boldrini and employed by Clearfield County, Pennsylvania, and was acting under color of state law.

6. (D. 6) JOHN "PHIL" DOE, P.S.P. he is a citizen and resident of Pennsylvania, the kidnapping Officer of Boldrini at the Philadelphia Intl. Airport, upon the airplane arrival on December 16, 2008 and was from December 16, 2008 at all times material to the allegations in this Complaint, acting in his capacity as Trp. employed by Pennsylvania State Police, and was acting under color of state law.

7. (D.7) JOHN SUGHRUE, is a citizen and resident of Pennsylvania and was at all times material to the allegations in this Complaint acting in his capacity as Plaintiff Defense Lawyer from the period of December 19, 2008 to March 6, 2009 employed as Principal of his Lawyer Firm, at Market St. Clearfield, PA, "private party" acting in conspiracy with the Defendants N.7 State Police and Assistant District Attorney N.10 to be considered was acting under color of the state law.

8. (D.8) LAURA HAWTHORN, is a citizen and resident of Pennsylvania and was at all times material to the allegation in this Complaint, acting in her capacity as Court record reporter employed by Schreiber Reporting Service, P. O. Box 997, St. Marys, Pennsylvania, 15857, interfering with due process of the law and part of the conspiracy with D.12 attorney John Sughrue and acting under the color of the state law.

10(D.9) a)JOHN DOE P.SERVERINE , And **D.9b) www.pacrimestoppers.org** is a citizen and resident of Pennsylvania and was from October 7, 2008 at all times material to the allegations in this Complaint, acting in his Capacity as Person in charge of the website , www.pacrimestopper.org supervised and under direction by the Pennsylvania State Police, employed by John Doe at 1800 Elmerton Avenue, Harrisburg 17110 Pennsylvania, acting direct instruction buy to be considered was acting under color of state law. Ph.1-717- 787-4802, email: pseverine@pacrimestoppers.org

11. (D.10) SAMUEL LOMBARDO is a citizen and resident of Pennsylvania and was from December 17, 2008 at all the time material to the allegations in this Complaint, acting in his capacity as Warden employed by Clearfield County Jail and acting under color of state law.

12. (D.11) JOHN M.F. DOE is a citizen and resident of Pennsylvania and was from December 17, 2008 at all the time material to the allegations in this Complaint, acting in his capacity as Deputy Lieutenant /Warden of Clearfield County Jail and employed by Clearfield County, Pennsylvania, and was acting under color of state law

13. (D.12) DANIEL J. NELSON Esq. is a citizen and resident of Pennsylvania and was from April 1, 2009 at all the time material to the allegations in this Complaint, acting in his capacity as Court Administrator of Clearfield County and employed by Clearfield County, Pennsylvania, and was acting under color of state law.

14. (D.13) JOHN A. REILLY is a citizen and Pennsylvania resident and was from December 16, 2008 at all the time material to the allegations in this Complaint, acting in his official capacity as Superintendent in charge at George W. Hill Prison 500 Cheyney Road Thornton and employed by Delaware County, Pennsylvania, and was acting under color of state law.

15. (D.14) WALTER A. STROHL is a citizen and resident of Delaware County, Pennsylvania and was from December 17, 2008 at all times material to the allegations in this Complaint, acting in his capacity as District Magistrate 32-2-48, Lima Pa. , employed by Delaware County , Pennsylvania, and he Boldrini arraign based on the paper faxed by Ponce ,and was acting under color of state law.

16. (D.15) JOHN DOE DEC.16 personally is a citizen and resident of Pennsylvania and was from December 16, 2008 at all the time material to the allegations in this Complaint, acting in his capacity as Constable prisoner transporter for Boldrini from the Philadelphia International Airport to George W. Hill Prison employed under Sheriff of Delaware County, and was acting under color of state law.

17. **(D.16)** CLARENCE CATALDO is a citizen and resident of Clearfield County, PA. and was at all times material to the allegations in this Complaint, acting as/or employed and /or owner and/or owner with interest in **D.16a)**CATALDO COLLISION SERVICE **D.16b)** CATALDO COLLISION, INC., located at 615 Division St. DuBois, Clearfield County, PA. 15801, and a “private party” acting in fraudulent conspiracy with other private parties and officials acting under color of the state law.

18. **(D.17)** KEN REBER & **D.17a)** CHARLES REBER & **D.17b)** BZ MOTORS CHRYSLER, INC. are citizens and / or resident of Union County, Pennsylvania , and REBER was at all times material to the allegations in this Complaint, acting as employed General Manager and co-owner with interest on BZ MOTORS CHRYSLER, INC. the auto dealership at 6801 W Branch Hwy Lewisburg , Union County, PA 17837, and as a “private party” acting in fraudulent conspiracy with other private parties and officials acting under color of the state law.

19. **(D.18)** DAVID W. SWARTZLANDER And **D.18a)** C.P.R. AUTO CENTER, Union County. DAVID W. SWARTZLANDER is a citizen and resident of Union County, Pennsylvania, and was at all times material to the allegations in this Complaint, acting as employed or Principal of C.P.R. AUTO CENTER, 930 State route 104, Mifflinburg, PA. 17844, as a “private party” acting in fraudulent conspiracy with other private parties and officials acting under color of the state law.

20. **(D.19)** DONALD “DON” FERRARIO is a citizen and resident of Bradford County, PA, and was at all times material to the allegations in this Complaint, acting as employed and co-owner of

21. **(D.19a)**FERRARIO AUTO CENTER And **D.19b)** FERRARIO AUTO TEAM multi brand car dealership with a location at RR 6, Towanda, Bradford County Pennsylvania and was acting as “private party” to be considered as was acting under color of the state law, based on Conspiracy Allegations which indicate DON FERRARIO as the “MANDANTE” engaged “Racketeering Modus Operandi Conduct’s” in conspiracy with private parties & state officials acting under colors of S. law.

22. (D.20) BRADLEY SHATINSKY is a citizen and resident of Pennsylvania and was from November 28, 2005 at all times material to the allegations in this Complaint, acting in his capacity as Corporal Tunkhannock barracks employed by the Pennsylvania State Police, and was acting under color of state law when he went to Plaintiff's Boltek office, at 237 Old River Rd., Wilkes-Barre, PA.

23. (D.21) RONALD JAROCHA is a citizen resident of the State of Pennsylvania and was from November 28, 2005 at all time material to the allegations in this Complaint, acting in his capacity as State Fire Marshall from the Wyoming barracks PA, employed by Pennsylvania State Police, and was acting under color of state law when he went to Boltek's office, 237 Old River Rd., Wilkes-Barre, PA.

24. (D.22a)GERRI MILLER And **D.22b)** JOHN DOE WWW.SOLOMONSWORDS.BLOGSPOT.COM are resident and operate from Pennsylvania at all times material to the allegations in this complaint, acting person in charge of the website, acting with/ or under direction by the PA. State Police, and /or their associates website broadcast entity to be considered was acting under the color of the law.

25. (D.23a)SCOTT D. CLINE; **D.38 b)** JENNIFER L. HUTTON And **D.23c)** LAURIE J. REED are citizens and residents of Pennsylvania, and herein listed with their official capacity related to **P.1**, as follows: **D.23a)** was in from January 9, 2009, P.1 Intermediate Punishment Coordinator, and **D.23b)** was **P.1'** Probation Officer from March 8, 2010 through June 22, 2011, And **D.23c)** was from March 8, 2009, the Collections Supervisor of the Department of Probation Services Adult Division, of Clearfield County, were at all the time material to the allegations in this complaint acting in their Official Capacity and employed by Clearfield County, PA; they were acting under color of state law.

26. (D.24a) FRANK PIONTEK; **D.24b)** ROBERT RACHILA; And **D.24c)** JAMIE MACLUNNY, are citizen and resident of Pennsylvania and they were at all times material to the allegations in this Complaint, acting in their official capacity as Officers employed by the Department of Probation and Parole Services Adult Division, of Luzerne County Pennsylvania from the period of March 2009, through June 30, 2011, (27 Months) and they were acting under color of state law.

III NATURE of the CASE

27. Plaintiff's civil rights has been violated under the USC 42 # 1985, 42 USC #1986

First, Second, Fourth, Fifth, Sixth, Eight, to the U.S. Constitution.

28. Further for **McFaul v. Randall-Owens**, 2007 U.S. Dist. LEXIS 78051 (E.D.Mich.Oct.22,2007) Defendants engaged in a "Modi Operandi" unique conduct and manners in which: ***"being so outrageous in character, and so extreme in degree, as to go beyond all possible bounds of decency, and to be regarded as atrocious, and utterly intolerable in a civilized society."*** And further on: ***Dennis v. Sparks***, 449 U.S.24, 101 S. Ct.183 and ***Adickes v. S.H. Kress & Co.***, 398 U.S.144, 90 S. Ct. 1598

29. The Supreme Court ruled that ***the "private parties" may be held to the same standard of "state actors" where the final and decisive act was carried out in conspiracy with a state official.***
Here the alleges list Count of Crimes of which P.1, P.1a and P.2 became and are victims of:

MISAPPLYING AND MISUSE OF PROCESS

CONSPIRACY FOR EXTORTION

FRAUD UPON THE COURT CRIME IN AID OF RACKETTERING ACTIVITY

PERJURY BY FALSE AFFIDAVIT

FALSIFIED AFFIDAVIT

FRAUD UPON the COURT

ACTS of TERRORISM

PERSECUTION intentional harass

OBSTRUCTION of JUSTICE

MENTAL ANGUISH

MALPRATICE

EXACTION

ENGAGING in MONETARY Tran/ unlawful

SLANDER Defamatory

LIBEL

EXTORTION

INTENTIONAL INFLICT. of EMOTIONAL DISTRESS

FORCED TO PAY RANSOM MONEY

RACKETEER INFLUENCED

EMOTIONAL DISTRESS

DEFAMATION of CHAR

MALFEASANCE

FORGERY DOCUMENTS

INTERSTATE COMMUNICATIONS

WRONGFUL DEAD

CONTINUING VIOLATION PRACTICE

TREASON

PROCEEDING AND JUDGMENT OUTSIDE OF JUDICIAL SYSTEM.

IV. SUMMARY'S OF FACT

30. This case was started by the Ignorance and Arrogance of Don Ferrario "*money and power*".

On July 22, 2005 **D.19 FERRARIO**, Bradford County signed contract with Boltek paid \$15,000 down payment and then cancelled it on November 29, 2005. What did he do to get the money back? Instead to dispute the case in Court he became the "MANDANTE" and "took the law in his hands". **First** sent two PA State Police, **D.20** and **D.21** against any legal procedure, to intimidate Boldrini's employees at his place of business in Wilkes-Barre while he was out of the country for business, and **Second** Boldrini was approached by reputed local Mob Boss and asked about the case FERRARIO and Boldrini explained : Ferrario's contract was agreed to be venue and jurisdiction in Wilkes-Barre. **Third** FERRARIO and **D.16 CATALDO** who also in March 18, 2005 cancelled his contract and Boltek forfeited \$ 35,500; together approached Carol Ponce a State Police Clearfield County PA.

On October 22, 2008 and published on **D.9** web's site www.pacrimestoppers.org.

They conspired and kidnapped **P.1 Antonello Boldrini** in order to force him to pay money.

They Misapplying process and used the court system to make believe Boldrini he need apply to ARD

To avoid charges that had never existed. The defendant with the judge created a parallel false

Proceeding in court to make appear real but was not. Boldrini Criminal History Criminal Record

Released on October 25, 2013 showed that his record of 2 misdemeanor was Expunge on

MARCH 16, 2012 and show that he never had ARD or any Disposition or charged by any court.

Boldrini file a copy of CHRI by the pa State Police.

On November 28, 2011 Judge Ammerman issued a False Expungement Order false and fraudulent

Never used for Expungement by the Police off course.

PLAINTIFF WILL FILE ALL DETAILS OF THE ALLEGATION NECESSARY FOR THIS COMPLAINT JUST AFTER FILE THIS SUMMARY TO VOID STATUTE LIMITATION.

REQUEST FOR RELIEF

Plaintiffs submitting to the Court the list of Requested Relief in this action that at this point is only indicative and it will be completed and presented with the total of compensatory damages in an amount deemed at time of trial to be just, fair, and also to be add with any further relief as the Court shall find just and appropriate.

The Damages claimed by the Plaintiffs are included but not limited to the follows:

I: Compensatory Damages

II: General Damages

III: Restitutionary or disgorgement damages

IV: Special Damages;Incidental damages;Consequential damages;Proximate Cause;

V: Punitive Damages;

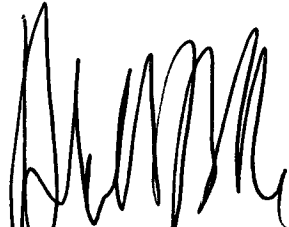
VI: Exemplary Damages

VII: Treble Damages;

However Plaintiff will present the list requested of **Preliminary Injunctions Relief** that need

immediate attention and action to be direct by the Court, and here are all together as follows:

WHEREFORE, I, Antonello Boldrini respectfully requests that the Preliminary Injunctive Relief be granted, and demands judgment for preliminary and post injunctive reliefs against all the Defendants jointly and severally for general, compensatory, special, incidental, consequential, exemplary, punitive damages, with the application of the treble damages in this case plus interest in an amount in excess of \$ 100.000.00(Hundred Thousand U.S. dollars) to be presented at time of trial and to be add with any further relief as the Court shall find just and appropriate. Further as prayer, Antonello Boldrini requests that all defendants were applicable, to be prosecute pursuant State and Federal laws in an exemplar matter in order to remind to whom act under color of law that the *legal system* can operate only within the respect of the U.S. Constitution, otherwise it will become illegal.



RESPECTFULLY SUBMITTED

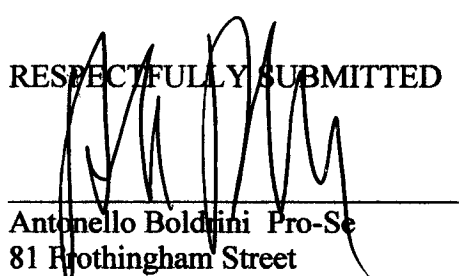
November 27, 2013

Antonello Boldrini Pro-Se
81 Frothingham Street
Pittston Twp, PA 18640
570-262-5207; 570-504-5892
boldriniantonello@yahoo.com

DECLARATION UNDER PENALTY OF PERJURY

The undersigned declares under penalty of perjury that he is the Plaintiff in the above Action, that he has read the above complain, and that the information contained therein is true and correct. 28 U.S.C.# 1746; 18 U.S.C.# 1746;18 U.S.C.# 1621

RESPECTFULLY SUBMITTED

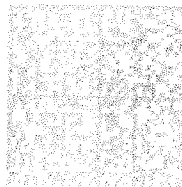


Antonello Boldrini Pro-Se
81 Frothingham Street
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570-262-5207; 570-504-5892
boldriniantonello@yahoo.com

November 27, 2013

[illegible]

PREORDER
 FIRST CLASS



Keywords: child sexual abuse; disclosure; social support; coping strategies

[illegible]

October 25 2013

SP4-106



**PENNSYLVANIA STATE POLICE
CENTRAL REPOSITORY - EXPUNGEMENT UNIT
1800 ELMERTON AVENUE
HARRISBURG, PENNSYLVANIA 17110-9758
717-783-5499**

**ANTONELLO BOLDRINI
81 FROTHINGHAM STREET
PITTSTON PA 18640**

This is to certify that on March 16, 2012, all criminal history record information in the custody of this agency pertaining to the arrest of:

NAME:	BOLDRINI, ANTONELLO	AKA:	BOLDRINI, ANTONELLO N
DOB:	1955/08/04	SSN:	939-28-2036
SID:	362-44-04-6	OCA:	C04-084850
ARRESTING AGENCY:	DUBOIS STATE POLICE	ORI:	PAPSP1700
DATE OF ARREST:	2008/10/07	OTN:	K813125-5

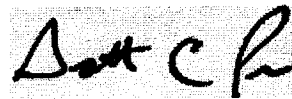
OFFENSE DATE	CHARGE(S)	COUNT	GRADE	DISP CHG	DISPOSITION
2004/11/17	CC3922A1 THEFT BY DECEPTION	1		No	
2004/11/17	CC4107A2 DECEPTIVE BUSINESS PRACTICES	1	M2	No	

have been, to the best of my knowledge and belief:

- ☐ Expunged as directed by Order of your Honorable Court, and in compliance with the Criminal History Record Information Act, 18 Pa.C.S.A. Sections 9122 or 9123.
- ☐ Expunged from the file of criminal history record information available for routine dissemination under the provisions of the Criminal History Record Information Act, 18 Pa.C.S.A. Section 9121. This expungement effected under the provisions of the Controlled Substance, Drug, Device and Cosmetic Act, Act 64 of 1972, as amended, Section 19.
- ☒ Expunged from the file of criminal history record information available for routine dissemination under the provisions of the Criminal History Record Information Act, 18 Pa.C.S.A. Section 9121. This expungement effected under the provisions of 18 Pa.C.S.A. Section 9122 upon successful completion of conditions of ARD, or any other pretrial or post-trial diversion or probation program.
- ☒ The fingerprints, name, and criminal history record information pertaining to the above captioned case are being retained solely for the purpose of determining subsequent eligibility of any pretrial or post-trial diversion or probation program and shall be made available to any court only upon request, in accordance with 18 Pa.C.S.A. Section 9122.

Agencies and individuals that were previously furnished, by this Department, criminal history record information pertaining to the above case were notified in accordance with 18 Pa.C.S.A. Section 9122.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott C. Price". The signature is written in a cursive style with a large initial "S" and a distinct "P".

Captain Scott C. Price
Director, Operational Records Division

Comment:

CC: